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April 3, 2019

VIA ECF & HAND DELIVERY

The Honorable Edgardo Ramos
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

MEMO ENDORSED

Re: *Christa McAuliffe Intermediate School PTO, Inc., et al. v. Bill de Blasio, et al.,*
18 Civ. 11657 (ER)

MEMO ENDORSED

On behalf of Proposed Defendant-Intervenors, we write to respectfully request to reschedule the pre-motion conference, which is currently scheduled for April 26, 2019, at 4pm. We have conferred with all parties, and there is no objection to this request. Counsel for all parties are available the prior week at any time on April 19, 2019. If that date is unavailable, counsel are also available at any time on April 16, 2019.

This is Proposed Defendant-Intervenors first request to reschedule the pre-motion conference. Unfortunately, lead counsel for the Proposed Defendant-Intervenors will be traveling and, therefore, unavailable during the week of April 22-26, 2019. Counsel for Defendants and Proposed Defendant-Intervenors prefer to have the conference earlier rather than later at the end of the month. In addition to consenting to rescheduling the conference, counsel for Plaintiffs and Defendants have agreed to submit their letter responses to Proposed Defendant-Intervenors' request for a pre-motion conference on an earlier date.

For the foregoing reasons, Proposed Defendant-Intervenors respectfully request that the Court reschedule the pre-motion conference regarding Proposed Intervenors' proposed motion to intervene to either April 19, 2019, or April 16, 2019.



Respectfully submitted,

/s/ Rachel Kleinman

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**Motion for Pro Hac Vice forthcoming*

Counsel for Proposed Defendant-Intervenors

Cc: All counsel of record (via ECF)

The conference is hereby rescheduled to 4:15 PM,
April 19, 2019.


Edgardo Ramos, U.S.D.J
Dated: 4/4/2019
New York, New York